

REMARKS

Claims 1 – 13, 17 – 21, 24 - 25, and 27 - 33 are pending. Claims 22 and 23 have been cancelled. Claims 31 – 33 have been added. Claim 1, 7, 17, 24, 25, and 27 have been amended. No new matter has been introduced. Reexamination and reconsideration of the application are respectfully requested.

In the June 3, 2005 Office Action, the Examiner rejected claims 1 – 3, 7, 10 – 18, 20, 22 – 27, and 29 – 30 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0161867 to Cochran et al. (“the Cochran reference”). The Examiner rejected claim 21 under 35 U.S.C. § 103(a) as being unpatentable over the Cochran reference. The Examiner rejected claims 4 – 6, 8 – 9, 19 and 28 under 35 U.S.C. § 103(a) as being unpatentable over the Cochran reference and further in view of U.S. Patent Application Publication No. 2004/0068576 to Lindbo et al. (“the Lindbo reference”). These rejections are respectfully traversed, as they are applicable to the presently pending claims.

Independent claim 1, as amended, distinguishes over the cited references.

Independent claim 1, as amended, recites:

A method for configuring a headless device, comprising:
sending, by a self-initiated configuration mechanism in the headless device, a configure service request to a configuration service mechanism across a network, the service request asking for a configuration specification corresponding to the headless device;
receiving, from the configuration service mechanism, the configuration specification to the self-initiated configuration mechanism at the headless device; and
configure, by the self-initiated configuration mechanism in the headless device, the headless device according to the configuration specification received from the configuration service mechanism.

The Cochran reference does not disclose the method of claim 1. The Examiner states that the Cochran reference teaches a mechanism which allows a headless device to send a configuration request to a configuration service mechanism across network in paragraph 39 of the Cochran reference. (*Office Action, page 10*). Specifically, the Examiner states that the computing device 14 of the Cochran reference is a headless device and that it may initiate the device configuration assembly 12. (*Office Action, page 10*). The Cochran reference discloses, in paragraph 39, that the device configuration assembly 12 may generate a remote network address corresponding to one of the remote device configuration assemblies 92 and 94, which have device-specific and generation configuration information and applications. For example, the computing device 14 may initiate the device configuration assembly 12 to identify the desired device for configuration, generate the appropriate remote network address, transmit the remote network address to the desired device, and initiate communication between the desired device and the remote device configuration assembly. Then, the remote device configuration assembly 92 or 94 may then be utilized to access device information and necessary software to configure the desired device for operation on the network. (*Cochran, paragraph 39*). Note that the computing device 14 is initiating the device configuration assembly, but it is initiating the device configuration assembly to configure remote device configuration assemblies, which in turn provide configuration assemblies to specific classes of devices. There is no disclosure that the computing device 14 is requesting configuration information which it will then receive to configure itself.

Further, the Examiner states that the computing device 14 is a headless device.

The applicant respectfully disagrees. The Cochran reference discloses that the computing device 14 includes various computing resources, such as a processor, circuitry, and memory, and also input / output devices to facilitate user interaction with the computing device 14. (*Cochran, paragraph 31*). Headless devices do not include input/output devices (except for a network controller) to facilitate user interaction with the headless device. In addition, the Cochran reference is not disclosing that the computing device 14 transmits a configuration request, receives the configuration specification, and configures the headless device with the configuration specification. The Cochran reference discloses only that a device configuration assembly 12 is utilized to configure one or more of computing devices 26 – 42 (not computing device 14). (*Cochran, paragraph 33*). The Cochran reference later discloses that the device configuration assembly 12 may be utilized by the computing device 14 to facilitate the configuration of remote devices (48, 50, 52, 54, 56, 58, 60, 62, 64, 66, 68, 70, 72, 74, 76, 78, 80, and 82). (*Cochran, paragraph 36*). Again, there is no disclosure in the Cochran reference that one of the remote devices (48 – 82) or computing device (26 – 42) sends out a configuration request, receives the configuration specification, and then configures the device with the configuration specification. Instead, the Cochran reference is disclosing that the device configuration assembly 12, the computing device 14, or the remote device configuration assemblies 92 and 94 control when remote devices are configured. In addition, the Cochran reference does not disclose that the device configuration assembly 12, the computing device 14, or the remote device configuration assemblies 92 or 94 are headless devices.

Accordingly, the Cochran reference does not disclose a method for configuring a

headless device including **sending, by a self-initiated configuration mechanism in the headless device, a configure service request to a configuration service mechanism across a network, the service request asking for a configuration specification corresponding to the headless device.** As noted above, none of the Cochran reference headless devices, i.e., remote computing devices 48 – 64 and 66 – 82, or computing devices 26 – 40, **send a configure service request**, as recited in claim 1, as amended. In contrast, the Cochran reference discloses that device configuration assembly 12 (or the computing device 14) initiates communication between a remote device configuration assembly and the computing devices (headless devices). The computing devices 26 – 40 or the remote computing devices 48 – 82 (which are akin to the headless device of claim 1) in the Cochran reference do not initiate the configuration request. Accordingly, applicants respectfully submit that claim 1 distinguishes over the Cochran reference.

Claim 1 further distinguishes over the Cochran reference. The Cochran reference does not disclose a method for configuring a headless device **including receiving the configuration specification at the headless device and configuring, by the self-initiated configuration in the headless device, the headless device according to the configuration specification.** As noted above, the Cochran reference discloses that either the configuration assembly 12, the computing device 14, or the remote device configuration assemblies 92 and 94 configure the headless devices. There is no disclosure that a mechanism in the headless device (akin to the claimed self-initiated configuration mechanism of claim 1) configures the headless device, as is recited in claim 1. Accordingly, applicant respectfully submits that claim 1,

as amended, distinguishes over the Cochran reference.

The Lindbo reference does not make up for the deficiencies of the Cochran reference. The Examiner utilizes the Lindbo reference to disclose that a list of alternative addresses may be maintained in order to allow a request to be routed to its destination in the event of primary route failure. (*Office Action, page 8*). The Examiner states that it would have been obvious to one of ordinary skill in the art to implement Cochran's system with the ability to use an alternate address in order to provide alternative routes in an event of a primary route failure. (*Office Action, page 8*). However, the Lindbo reference does not disclose a method for configuring a headless device including **sending, by a self-initiated configuration mechanism in the headless device, a configure service request to a configuration service mechanism across a network, the service request asking for a configuration specification corresponding to the headless device**. Further, the Lindbo reference does not disclose a method for **configuring a headless device including receiving the configuration specification at the headless device and configuring, by the self-initiated configuration in the headless device, the headless device according to the configuration specification**. Accordingly, applicant respectfully submits that claim 1, as amended, distinguishes over the Lindbo / Cochran combination.

Independent claims 7, 17, 24, and 27 recite limitations similar to claim 1, as amended. Accordingly, applicant respectfully submits that independent claims 7, 17, 24, and 27, all as amended, distinguish over the Cochran / Lindbo combination for reasons similar to those discussed above in regard to independent claim 1, as amended.

Claims 2 – 6, 8 – 9, 18 – 21, 25, 28, and 31 - 33 depend, indirectly or directly, on

independent claims 1, 7, 17, 24, and 27, respectively. Accordingly, applicant respectfully submits that claims 2 – 6, 8 – 9, 18 – 21, 25, and 28 distinguish over the Cochran / Lindbo combination for the same reasons as those discussed above in regard to claim 1.

Dependent claim 4 further distinguishes over the cited references. Dependent claim 4 recites:

The method according to claim 3, wherein the sending includes:
requesting a routable address from a DHCP server;
selecting, if the routable address cannot be retrieved from the DHCP server, an alternative routable address from at least one alternative routable address stored in an alternative routable address storage in the headless device; and
requesting the configuration from the configuration service mechanism using the device identification, that is to be used to identify the configuration specification, and the routable address or the alternative routable address, to where the configuration specification of the headless device is to be returned.

The Examiner states that the Cochran reference does not set forth the limitation of selecting a routable address if the routable address cannot be retrieved from the DHCP server, an alternative routable address stored in an alternative routable address storage in a headless device. (*Office Action, page 8*). The applicant agrees with the Examiner and respectfully submits that claim 4 further distinguishes over the Cochran reference.

The Examiner states that the Lindbo reference discloses the highlighted limitation. (*Office Action, page 8*). The applicant respectfully disagrees with the Examiner. The Lindbo reference is directed to an interceptor 20 which is coupled to a plurality of user terminals (user 1, user 2, user N), is coupled to a first switching point 30 (for access to the Internet), and is also coupled to a local server 40, called a mirror

server. (*Lindbo*, paragraphs 48 – 51). The *Lindbo* reference in paragraph 27 (which is where the Examiner states that the highlighted limitation is disclosed) discloses that in order for a request to be easily directed to the correct location on the server 40 or servers, at least one alternative address exists, and that a lookup table preferably includes a second list of alternative addresses being associated with information content provider addresses. In addition, the *Lindbo* reference discloses that when the interceptor devices that a copy of at least part of the information provided at the requested information address exists on one of the local servers, the second list provides the exact location of the alternative address on the server, which allows the request to be re-routed directly to the alternative address. (*Lindbo*, paragraph 27). In summary, the *Lindbo* reference is disclosing that the interceptor 20 intercepts an information request from an Internet user directed to an Internet content provider, and determines whether the intercepted request is directed to a content provider that has an associated alternative address on a local server 40, and directs the request to an alternative address if the alternative address exists. (*Lindbo*, *Abstract*).

This is not the same as a method for configuring a headless device, wherein **selecting, if the address cannot be retrieved from the DHCP server , an alternative routable address from at least one alternative routable address stored in a alternative routable address storage in the headless device.** It is not the same because the *Lindbo* reference is directed to an interceptor that intercepts communications from users who are transferring information on the Internet and then checks on a local server 40 to see if an Internet content provider has an alternative address on that local server 40 that also has the requested information. The *Lindbo*

reference is not disclosing that **a headless device cannot get an address from a DHCP server, and then retrieves an address from storage (i.e., the alternative routable address storage) in the headless device**, as is recited in claim 4. In contrast, the Lindbo reference discloses that an interceptor 20 working with a lookup table on a server 40 (and not the user terminals which are akin to the headless device of claim 4) takes a communication directed to a first address of an Internet content provider and sees if there is an alternative address in the server 40 that has the same information. The Lindbo reference is also not disclosing that **an address cannot be received from a server** (i.e., a DHCP server). In contrast, the information can be retrieved from the internet content provider, the Lindbo interceptor is just checking to see if the info is available locally. Specifically, the Lindbo reference is looking for the information at a closer location (i.e., within the server 40). The applicant also notes that this all occurs at the interceptor and server, not the user terminals (the user terminals being akin to the headless device of claim 4). Accordingly, the applicant respectfully submits that claim 4 distinguishes over the Lindbo / Cochran combination.

Claim 8, 19, and 28 recited limitations similar to claim 4, as amended. Accordingly, applicants respectfully submit that claims 8, 19, and 28 distinguish over the Cochran / Lindbo reference combination.

Claim 10 distinguishes over the cited prior art. Claim 10 recites:

A method for a configuration service, comprising:
receiving a configure service request from a headless device with a device identification associated with the headless device;
initializing a configuration specification of the headless device, if the request requests to set up an initial configuration specification of the headless device with the configuration service;
updating the configuration specification of the headless device, if the request requests to update the current configuration specification of the headless device; and

forwarding the configuration specification of the headless device to a routable address received with the request, if the request requests a configuration service.

The Cochran reference does not disclose, teach, or suggest the method for a configuration service of claim 10. None of the device configuration assembly 12, the computing device 14, or the remote device configuration assemblies 92 and 94 disclose **receiving from a headless device a configure service request**, as recited in claim 10, as amended. In contrast, the Cochran reference discloses that the device configuration assembly 12 initiates an interactive configuration process between the remote device configuration assemblies and the desired computing device. (*Cochran, paragraph [0040]*). After the initiation, the remote device configuration assembly can, transmit web pages to the computing device. (*Cochran, paragraph [0040]*). In other words, the headless device of the Cochran reference does not initiate the configure service request. Accordingly, applicant respectfully submits that claim 10, as amended, distinguishes over the Cochran reference.

Independent claim 29 recites limitations similar to claim 10, as amended. Accordingly, applicant respectfully submits that claim 29 distinguish over the Cochran reference for reasons similar to those discussed above in regard to claim 10.

Claims 11 – 13 and 30 depend, indirectly or directly, on claims 10 and 29, respectively. Accordingly, applicant respectfully submits that claims 11 – 13 and 30 distinguish over the Cochran reference for the same reasons discussed above in regard to claim 10, as amended.

Applicant believes that the claims are in condition for allowance, and a favorable action is respectfully requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference would advance prosecution of the application.

Respectfully submitted,

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